

EXHIBIT

"A"

DISCOVERY REQUESTS PRESENTLY AT ISSUE

1. Documents identifying which ports were visited in the 7th Fleet area of responsibility ("AOR") by CVNs and LHD/LHAs transiting through the 7th Fleet area of responsibility, the U.S.S. Gridley, U.S.S. George Washington, U.S.S. Essex, and U.S.S. Blue Ridge and U.S.S. Mustin from 2008-2013.

2. All documents relating to Courses of Action ("COA") developed for each CVN and LHD/LHA transiting through the 7th Fleet AOR, the U.S.S. Gridley, U.S.S. George Washington, U.S.S. Essex, and U.S.S. Blue Ridge and U.S.S. Mustin from 2008-2013, including, but not limited to, final approved plans.

3. All e-mails, power point slides and word processing documents relating to the port visit decisions in the 7th Fleet AOR for CVNs and LHDs/LHAs transiting through the 7th Fleet AOR, the U.S.S. Gridley, U.S.S. George Washington, U.S.S. Essex, and U.S.S. Blue Ridge, U.S.S. Mustin in the from 2008-2013.

4. All Theater Security Cooperation plans and Country Engagement plans at the 7th Fleet, Pac Fleet and PACOM levels for the 7th Fleet area of responsibility including, but not limited to, the ORACLE, from 2008-2013.

5. All documents/communications pertaining to port threat assessment and port protection planning for ports in the 7th Fleet AOR including, but not limited to, approved Force Protection ("FP") plans, FP logistics requisitions ("LOGREQS"),

After Action Reports ("AARs") and Lessons Learned reports for the 7th Fleet AOR from 2008-2013.

6. All messages and word documents relating to AARs for port visits in the 7th Fleet AOR from 2008-2013.

7. All word documents, communications, presentations and any other memorializations of discussions and proposals for port visits made at the semi-annual 7th Fleet Scheduling Conference from 2008-2013, including all scheduling conference outbriefs.

8. All documents relating to the Annual 7th Fleet Theater Security Cooperation Conferences from 2008-2013.

14. All documents and communications relating to port visit cost reduction initiatives in the 7th Fleet AOR, including all documents memorializing meetings regarding the same from 2008-2013.

15. All documents concerning communications between Leonard Francis, Captain Carr (N4) and Captain Williams (COS) regarding port visit cost savings associated with GDMA's regional contract in 2012.

16. All e-mails, correspondence and other documents memorializing communications between Leonard Glenn Francis and any U.S. Navy Ship Captains, 06 Captains and flag officers transiting through or permanently assigned to the 7th Fleet AOR between 2008-2013.

17. All e-mails, correspondence and other documents memorializing communications between the person referred to in

the complaint as "EA" and any U.S. Navy Ship Captains, 06 Captains and flag officers transiting through or permanently assigned to the 7th Fleet AOR during his employment at GDMA from 2009-2012.

19. Any documents memorializing evaluations of HSP performance in the 7th Fleet AOR from 2008-2013.

20. All memorializations of statements made by Misiewicz to NCIS during his interview in or around September 2011.

EXHIBIT "B"



NEWS RELEASE

OFFICE OF THE UNITED STATES ATTORNEY SOUTHERN DISTRICT OF CALIFORNIA

San Diego, California

***United States Attorney
Laura E. Duffy***

Assistant U. S. Attorneys Mark W. Pletcher (619) 546-9714 or Robert S. Huie (619) 546-7053

For Immediate Release

INTERNATIONAL BRIBERY SCHEMES UNCOVERED INVOLVING HUNDREDS OF MILLIONS OF DOLLARS IN DEFENSE CONTRACTS

***United States Naval Commander, NCIS Supervisory Special Agent and
International Businessman Arrested Today***

NEWS RELEASE SUMMARY – September 17, 2013

SAN DIEGO, CA – Three individuals – a commander in the United States Navy, a special agent for the Naval Criminal Investigative Service (NCIS) and the CEO of a multinational defense contractor – were charged in criminal complaints unsealed today in connection with two separate bribery schemes.

The complaints allege that Leonard Glenn Francis, the CEO of Singapore-based Glenn Defense Marine Asia Ltd. (GDMA), paid U.S. Navy Commander Michael Vannak Khem Misiewicz and NCIS Supervisory Special Agent John Bertrand Beliveau II with luxury travel and prostitutes in exchange for confidential information and other assistance in relation to hundreds of millions of dollars in Navy contracts.

Francis was arrested in San Diego yesterday evening and made his initial appearance in federal court this afternoon before U.S. Magistrate Judge Karen S. Crawford. Also yesterday, Misiewicz and Beliveau were arrested in Colorado and Virginia, respectively. The next date in the cases is a hearing set for Friday, September 20, 2013 at 9:30am before U.S. Magistrate Judge William McCurine Jr., in federal court in San Diego, to determine whether Francis should be detained as a flight risk and as a risk to obstruct justice. Francis will remain in custody without bond pending Friday's hearing. The United States will seek the removal of Misiewicz and Beliveau to San Diego to face the charges.

U.S. Attorney Laura E. Duffy of the Southern District of California and Acting Assistant Attorney General Mythili Raman of the Justice Department's Criminal Division made the announcement after the complaints were unsealed.

As set forth in the complaints, Francis, a Malaysian national who resides in Singapore, is the chief executive officer and president of Glenn Defense Marine Asia Ltd. (GDMA), a multi-national corporation with headquarters in Singapore and operating locations in other countries, including Japan, Singapore, Thailand, Malaysia, Korea, India, Hong Kong, Indonesia, Australia, Philippines, Sri Lanka and the United States. GDMA provides hundreds of millions of dollars in "husbanding" services to the U.S. Navy, which involves the coordinating, scheduling and procurement of items and services required by ships and submarines when they arrive at port. These services include, for example, providing tugboats and fenders; paying port authority and customs fees; furnishing security and transportation; supplying provisions, fuel and water; and removing trash and collecting liquid waste.

Misiewicz, 46, is a commander and captain-select in the U.S. Navy, assigned to U.S. Northern Command located at Peterson Air Force Base in Colorado Springs, Colo. Before this position, he served as the deputy operations officer for the U.S. Commander, Seventh Fleet aboard the USS Blue Ridge. The Seventh Fleet's area of operations consists of 48 million square miles extending from Japan to Diego Garcia in the Indian Ocean and from Vladivostok, Russia, to Australia. As the deputy operations officer, Misiewicz had high-level exposure to the operational planning for ships in the Seventh Fleet and for any U.S. Navy ship traveling through the Seventh Fleet's area of responsibility. He also held influence in determining or modifying the schedule of port visits for U.S. Navy vessels.

Beliveau, 44, is a supervisory special agent for NCIS at Quantico, Va. In that position, he has had access to the internal NCIS database containing investigative reporting, including reports into an investigation by NCIS into possible fraud committed by GDMA in billing the U.S. Navy under its contracts.

According to one of the criminal complaints, Misiewicz and Francis allegedly engaged in a conspiracy to commit bribery. As part of the conspiracy, Misiewicz sent to Francis information that the Navy had classified as "Confidential," including schedules reflecting the movements of Navy ships months in advance. Misiewicz also operated as an advocate within the Navy for GDMA's interests, urging decisions about port visits and contractor usage that were designed to benefit GDMA. In return, Francis provided Misiewicz with paid travel, luxury hotel stays and prostitution services. To communicate with Francis privately, Misiewicz set up a special personal email account with a name that included Francis's initials.

As set forth in another complaint, Beliveau and Francis allegedly entered into a separate bribery conspiracy. As part of that conspiracy, Beliveau provided Francis with confidential information about the NCIS criminal fraud investigation into GDMA by secretly downloading reports from the NCIS database and conveying the information to Francis. Beliveau also allegedly provided Francis guidance as to how to deal with NCIS inquiries. In exchange, Francis provided Beliveau with, among other things, paid travel, luxury hotel stays and prostitution services.

Each defendant was charged with conspiring to commit bribery, which carries a maximum penalty of five years in prison. A criminal complaint is merely an allegation, and every defendant is presumed innocent until proven guilty beyond a reasonable doubt.

This ongoing investigation is being conducted by NCIS, the Defense Criminal Investigative Service, the Defense Contract Audit Agency, and the Drug Enforcement Administration. The Criminal Division's Office of International Affairs provided significant assistance in this matter, and the Royal Thai Police and the Corrupt Practices Investigation Bureau Singapore also provided law enforcement assistance. This case is being prosecuted by Assistant U.S. Attorneys Mark Pletcher and Robert Huie of the Southern District of California and Catherine Votaw, Director of Procurement Fraud for the Criminal Division's Fraud Section.

Those with information relating to fraud, corruption or waste in government contracting should contact the NCIS anonymous tipline at www.ncis.navy.mil or call the DoD Hotline at (800) 424-9098.

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DEFENDANTS

Case Number: 13-MJ-3456

Leonard Glenn Francis
John Bertrand Beliveau II

Case Number: 13-MJ-3457

Leonard Glenn Francis
Michael Vannak Khem Misiewicz

SUMMARY OF CHARGES

Case Number: 13-MJ-3456

Conspiracy to Commit Bribery in violation of 18 U.S.C. § 371

Case Number: 13-MJ-3457

Conspiracy to Commit Bribery in violation of 18 U.S.C. § 371

INVESTIGATING AGENCIES

Defense Criminal Investigative Service
Naval Criminal Investigative Service
Homeland Security Investigations
Drug Enforcement Administration